

02/12/1998

ENVIRONMENTAL
PROTECTION AGENCY

FEB 12 1998

ASARCO

MONTANA OFFICE

February 12, 1998

John F. Wardell
Director
U.S. Environmental Protection Agency
Region VIII, Montana Office
Federal Building
301 South Park
Helena, Montana 59626-0096

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VIA HAND DELIVERED

Dear Mr. Wardell:

Asarco is in receipt of your February 11, 1998 letter requesting information pursuant to Section 3007 of RCRA. The information that is requested relates to the suspected release of plant water from the Asarco East Helena Plant's underground water piping system. This suspected release was first reported to Susan Zazalli by Jon Nickel on February 9, 1998.

a. The date and time Asarco became aware of the release:

The date and time when Asarco first became aware of a potential release(s) of plant water through the underground piping system was February 3, 1998 at approximately 7:00 am. At that time, Asarco immediately began to take actions to stop the suspected leak(s) by isolating sections of the underground, plant water piping system.

It is noteworthy to add that plant water consists of water which is recirculated within the plant water circuit and does not include the process water generated in the acid plant scrubber system. This water is treated in the High Density Sludge water treatment plant.

b. The manner in which Asarco became aware of the release:

Asarco first became aware of a suspected release(s) when the water level in the one-million gallon storage tank began to decrease. The water level in the one-million gallon tanks will experience normal variations depending upon consumptive uses within the plant. It was only after the plant water level in the one-million gallon tank began to decrease at an abnormal rate that a leak(s) was suspected. It should be noted that there has been no visible evidence of a release of plant water from the underground piping system and that the water level change in the one-million gallon tank is the only basis for the suspected leak(s).

- c. If the release has been stopped, the date and time the release was stopped, the total volume of water released, the location of the release, and the manner in which the release was stopped;

The date and time the suspected release(s) was stopped was February 12, 1998 at approximately 9:30 am. This was the date and time when the pressurized, underground plant water system was shutdown by closing the main water valve located immediately down gradient of the pumphouse.

Asarco believes that the suspected plant water leak(s) is confined to the pressurized, underground system that delivers plant water throughout the smelter. This system is no longer being supplied with plant water. A temporary, above ground piping system has been constructed to replace the underground systems which are critical to operations. Non-critical operations are no longer being supplied with plant water through the underground piping system. All return lines to the one-million gallon tanks are believed to be intact because of their new condition.

The estimated total volume of water released from February 3, 1998 through February 12, 1998 is approximately one million gallons. Based upon this estimate and the historical quality of plant water, it is estimated that approximately 8 pounds of arsenic, approximately 80 pounds of cadmium, and approximately 80 pounds of lead were released throughout the period. The exact location of the leak(s) has yet to be identified. The leak(s) was stopped by eliminating the source of plant water to the underground piping system.

- d. If the release is continuing, the rate at which the circuit is leaking, the volume of water released to date, and the location of the release.

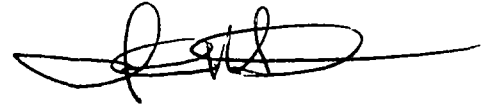
The suspected release has been stopped as confirmed by the stabilization of the water level in the one-million gallon tank.

- e. If the release has not been isolated, provide a description of activities to date to isolate the release.

The suspected release has been isolated by no longer supplying the underground piping system down gradient of the pump house with plant water.

Attached to this response is a Certification Statement. After you have had an opportunity to review the information in this letter, I would be happy to meet with you to discuss this matter in greater detail.

Sincerely,

A handwritten signature in black ink, appearing to read 'John R. Shaw', with a long horizontal flourish extending to the right.

John R. Shaw

C E R T I F I C A T I O N S T A T E M E N T

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



Print Name:

JOHN SHAW

Title :

PLANT MANAGER

Date :

2-12-98